

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY	
Caption in compliance with D.N.J. LBR 9004-1 E. RICHARD DRESSEL, ESQ. (ED1793) LEX NOVA LAW LLC 10 E. Stow Road, Suite 250 Marlton, NJ 08053 rdressel@lexnovallaw.com (856) 382 - 8211 Attorneys for Andrew Sklar, Chapter 7 Trustee	Case No.: 22-19628(ABA) Chapter: <u>7</u>
In Re: ORBIT ENERGY & POWER, LLC, Debtor.	Judge: <u>Andrew B. Altenburg</u> Hearing Date: March 19, 2024 at 10:00 a.m.

**NOTICE OF MOTION OF ANDREW SKLAR, CHAPTER 7 TRUSTEE,
FOR THE ENTRY OF AN ORDER APPROVING (A) THE PUBLIC AUCTION SALE
OF CERTAIN OF THE DEBTOR’S VEHICLES FREE AND CLEAR OF LIENS,
CLAIMS, ENCUMBRANCES, AND INTERESTS PURSUANT TO 11 U.S.C. § 363(b)
AND (f) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 6004, AND
(B) PROCEDURES GOVERNING THE PUBLIC AUCTION SALE**

PLEASE TAKE NOTICE that on March 19, 2024 at 10:00 a.m., or as soon thereafter as counsel may be heard Andrew Sklar, the Chapter 7 Trustee (the “Trustee”) in the instant Chapter 7 case, by and through his undersigned counsel, will move before the Honorable Andrew B. Altenburg, United States Bankruptcy Judge at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Courtroom 4B, Camden, NJ 08101 at 10:00 a.m., for the entry of an order approving (A) the public auction sale of certain of the Debtor’s vehicles free and clear of liens, claims, encumbrances and interests pursuant to 11 U.S. C. § 363(b) and (f) and Federal Rule of Bankruptcy Procedure 6004(b), and (B) procedures governing the public auction sale (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned

will rely on the Certification of Andrew Sklar submitted herewith pursuant to D.N.J. LBR 9013- l(a).

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, U.S. Post Office and Courthouse, 401 Market Street, Camden, New Jersey 08101, and served upon the Trustee's undersigned counsel at Lex Nova Law LLC, 10 E. Stow Road, Suite 250, Marlton, NJ 08053, not later than seven (7) days prior to the return date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3 and the relief sought herein may be granted without a hearing.

Dated: February 16, 2024

LEX NOVA LAW LLC

By: /s/ E. Richard Dressel
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